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Attorneys for Defendant/Counterclaimant
PROVIDENT LIFE AND ACCIDENT
INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ROBERT H. CHRISTENSEN,

Plaintiff,

v.

PROVIDENT LIFE AND ACCIDENT
INSURANCE COMPANY,

Defendant.

PROVIDENT LIFE AND ACCIDENT
INSURANCE COMPANY,

Counterclaimant,

v.

ROBERT H. CHRISTENSEN,

Counterdefendant.

CASE NO.: C 07 04789 JF

**STIPULATION AND [PROPOSED]
ORDER**

1 The parties, plaintiff and counterdefendant Robert H. Christensen ("plaintiff") and defendant
2 and countercomplainant Provident Life and Accident Insurance Company ("defendant"), through
3 their respective counsel of record, hereby stipulate as follows:

4 The parties had previously proposed, and the Court had confirmed an Expert Disclosure date
5 of November 14, 2008. While the parties have been engaged in the initial stages of discovery, they
6 mutually have realized that efficient case management would suggest that they agree to reschedule
7 the Expert Disclosure related dates until after the beginning of the new year.

8 Therefore, the parties propose the following amendment to the existing pretrial schedule for
9 Expert Disclosure, with the Discovery Cut-off date and other court-ordered dates remaining
10 unchanged, and request the Court to issue an order accordingly:

11 Expert Disclosures: February 23, 2009

12 Supplemental Disclosures: March 2, 2009

13 Discovery Cut-off: March 13, 2009

14 Of course, if the Court has questions about this request, or is otherwise inclined, the parties
15 will make themselves available for a telephonic conference to discuss this issue with the Court, or
16 can appear in person per the Court's desire.

17 **IT IS SO STIPULATED**

18 Dated: November 12, 2008 MILLER MORTON CAILLAT & NEVIS, LLP

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20 By: _____/s/
21 JOSEPH A. SCANLAN
22 Attorneys for Plaintiff/Counterdefendant
23 ROBERT H. CHRISTENSEN
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1 Dated: November 12, 2008 WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

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3 By: _____/s/
4 THOMAS M. HERLIHY
5 FRANCIS TORRENCE
6 CHRISTINA VAN WERT
7 Attorney for Defendant/Counterclaimant
8 PROVIDENT LIFE AND ACCIDENT
9 INSURANCE COMPANY

10 ORDER


11 Good cause appearing, it is hereby ordered that the existing pretrial schedule be amended as
12 follows:

13 Expert Disclosures: February 23, 2009
14 Supplemental Expert Disclosures: March 2, 2009
15 Discovery Cut-off: March 13, 2009

16 All other pretrial and trial dates remain the same. _____.

17 IT IS SO ORDERED

18 Date: 11/13, 2008

19 
20 JEREMY FOGEL
21 JUDGE OF THE UNITED STATES
22 DISTRICT COURT